

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BUFFALO PATENTS, LLC,

Plaintiff,

v.

ZTE CORPORATION,

Defendant.

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CIVIL ACTION NO. 6:21-cv-1065-ADA

**NOTICE OF SPECIAL APPEARANCE AND AGREED EXTENSION OF TIME TO
MOVE, ANSWER, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT**

In accordance with the Court’s standing Order signed the 11th day of August 2021, ZTE Corporation (“ZTC”) notifies the Court that Plaintiff Buffalo Patents, LLC (“Buffalo Patents”) agreed to another 30-day extension of time for ZTC to answer, move, or otherwise respond to Buffalo Patents’ Complaint. This request is unopposed; does not change the date for any hearing, final submission to the Court related to a hearing, or trial; and does not waive any defenses described or referred to in FED. R. CIV. P. 12. Furthermore, good cause exists to permit this unopposed extension because ZTC and Buffalo Patents are engaging in active settlement discussions which have the potential to resolve any purported disputes amongst the parties identified in the Complaint.

WHEREFORE, ZTC respectfully requests the Court allow another 30 days for ZTC to answer, move, or otherwise respond to Buffalo Patents' Complaint, extending the deadline to February 18, 2022. The undersigned specially appears for the sole purpose of seeking this unopposed extension of time for ZTC to answer, move, or otherwise respond to the Complaint.

DATED: January 18, 2022

Respectfully submitted,

/s/ Everett Upshaw

Everett Upshaw

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*Counsel for ZTE Corporation
for the limited purpose of seeking
this unopposed extension of time*

CERTIFICATE OF CONFERENCE

By telephone, Zachariah S. Harrington, counsel for Buffalo Patents, advised that Buffalo Patents does not oppose the foregoing request for extension.

/s/ Everett Upshaw

Everett Upshaw

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2022, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which forwards electronic notification of such filing to all counsel of record.

/s/ Everett Upshaw

Everett Upshaw